

REMARKS

Claims 1, 4-10, 12, 14-19, and 21-32 were considered by the Examiner. Claims 1, 4-10, 12, 14-19, and 21-32 stand rejected by the Examiner. Thus, claims 1, 4-10, 12, 14-19, and 21-32 are pending. A telephone conference between Examiner Moore and Thomas Chuang, attorney for Applicant, was conducted on December 27, 2007, the subject matter of which is discussed below where applicable.

Rejections under 35 U.S.C. Sec. 102

Claims 31 and 32 are rejected under 35 U.S.C. 102(e) as being anticipated by Alexander et al. (US 6,798,767).

Claim 31 reads as follows:

31. A method of addressing a call center or telephony asset on a network, comprising:
determining a network address for the asset using an electronic identifier; and
using the network address to communicate with a remote system over a network;
wherein the asset is selected from the group consisting of: *a headset and a handset lifter.*

Claim 31 teaches a method of addressing a call center or telephony asset on a network. The method includes determining a network address for a headset or handset lifter using an electronic identifier and using the network address to communicate with a remote system over a network.

Alexander does not teach a method of addressing a headset or handset lifter where the method includes determining a network address for the headset or handset lifter using an electronic identifier, and using the network address to communicate with a remote system over a

network. Examiner cites Alexander at Col. 4, lines 12-14, where Alexander states that a headset is connected to a personal computer 24 to form an IP telephony device. However, by stating that a headset must be connected to a personal computer 24 to form the IP telephony device, Alexander *teaches away* from claim 31. Claim 31 teaches that a network address is determined for a headset or handset lifter, whereas in Alexander, the network address is determined for personal computer 24. In Alexander, personal computer 24 is referred to by itself as an IP telephony device together with IP telephony devices 22-23. See Alexander at Column 3, lines 66 to Column 4, line 1. Thus, one of ordinary skill in the art would recognize that in Alexander, it is personal computer 24 for which a network address can be determined using an electronic identifier, rather than the headset coupled to personal computer 24. Alexander makes no mention that a network address is determined *for the headset* utilizing an electronic identifier, and does not teach that the headset is anything more than a prior art headset having only a microphone and speaker.

During a telephone call with Examiner on December 27, 2007, Examiner indicated that the claim term “headset” could possibly be interpreted broadly. However, Applicant respectfully submits that one of ordinary skill in the art would not define the term “headset” to encompass both a headset *and* a personal computer to which the headset is connected. Only under such an interpretation would Alexander anticipate claim 31, and Applicant respectfully submits that such an interpretation is unreasonable in view of the ordinary usage and meaning of the different terms “headset” and “personal computer”.

Thus, at least for the foregoing reasons, applicant respectfully submits that Alexander does not teach or suggest all the claimed elements of claim 31.

Claim 32

Claim 32 is dependent on claim 31. Therefore, it is respectfully submitted that claim 32 is patentable over Alexander at least for the reasons stated above with respect to the patentability of claim 31. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claim 32. Thus, at least for the foregoing reasons, applicant respectfully submits that Alexander does not teach or suggest all the claimed elements of amended claim 32.

Rejections under 35 U.S.C. Sec. 103

Rejections under 35 U.S.C Sec. 103(a)

Claims 1, 4-10, 12, 14-19, 21-23, and 28-30 are rejected under 35 U.S.C. 103(a) as being unpatentable over Alexander.

Claim 1 reads as follows:

1. (amended) A telephony asset for being managed over a network by a remote system, the asset comprising:
 - a memory storing an electronic identifier mappable to a network address;
 - a network connection configured to communicate with a network; and
 - a network interface communicatively coupled to the network connection, the network interface configured to communicate over the network with the remote system using the network address;wherein *the asset is at least one member selected from the group consisting of: a headset and a handset lifter.*

Claim 1 teaches a telephony asset for being managed over a network by a remote system. The asset is either a headset or a handset lifter. The headset or handset lifter includes a memory storing an electronic identifier mappable to a network address, a network connection configured to communicate with a network, and a network interface communicatively coupled to the

network connection. The network interface is configured to communicate over the network with the remote system using the network address.

Alexander does not teach or suggest a headset or a handset lifter which includes a memory storing an electronic identifier mappable to a network address. Examiner cites Alexander at Col. 4, lines 12-14, where Alexander states that a headset is connected to a personal computer 24 to form an IP telephony device. However, by stating that a headset must be connected to a personal computer 24 to form the IP telephony device, Alexander *teaches away* from claim 1. Claim 1 teaches that a headset includes a memory storing an electronic identifier mappable to a network address, whereas in Alexander, one of ordinary skill in the art will recognize that it is personal computer 24 coupled to LAN 20a which includes a memory storing an electronic identifier mappable to a network address. In Alexander, personal computer 24 is referred to by itself as an IP telephony device together with IP telephony devices 22-23. See Alexander at Column 3, lines 66 to Column 4, line 1. Alexander makes no mention that the *headset* (coupled to personal computer 24) includes a memory storing an electronic identifier mappable to a network address.

During a telephone call with Examiner on December 27, 2007, Examiner indicated that the claim term “headset” could possibly be interpreted broadly. However, Applicant respectfully submits that one of ordinary skill in the art would not define the term “headset” to encompass both a headset *and* a personal computer to which the headset is connected. Only under such an interpretation would Alexander anticipate claim 1, and Applicant respectfully submits that such an interpretation is unreasonable in view of the ordinary usage and meaning of the different terms “headset” and “personal computer”.

Thus, at least for the foregoing reasons, applicant respectfully submits that Alexander does not teach or suggest all the claimed elements of amended claim 1.

Claims 4-7

Claims 4-7 are dependent on claim 1. Therefore, it is respectfully submitted that claims 4-7 are patentable over Alexander at least for the reasons stated above with respect to the patentability of claim 1. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 4-7.

Claim 8

Claim 8 reads as follows:

8. A telephony asset assembly for being managed over a network by a remote system, the assembly comprising:
- an asset comprising a headset or handset lifter, the asset having an electronic identifier stored therein, the electronic identifier mappable to a network address;*
 - a network interface communicatively coupled to the asset and configured to communicatively couple with the remote system over a network using the network address; and
 - a management module, the management module operatively coupled to the asset for performing a management task thereon.

Claim 8 teaches a telephony asset assembly for being managed over a network by a remote system. The assembly includes a headset or handset lifter. The headset or handset lifter has an electronic identifier stored therein, with the electronic identifier mappable to a network address. The assembly includes a network interface communicatively coupled to the asset and configured to communicatively couple with the remote system over a network using the network address. The assembly further includes a management module, where the management module is operatively coupled to the asset for performing a management task thereon.

Alexander does not teach or suggest a telephony asset assembly for being managed over a network by a remote system where the assembly includes a headset or handset lifter having an electronic identifier stored therein, with the electronic identifier mappable to a network address.

Examiner cites Alexander at Col. 4, lines 12-14, where Alexander states that a headset is connected to a personal computer 24 to form an IP telephony device. However, by stating that a headset must be connected to a personal computer 24 to form the IP telephony device, Alexander *teaches away* from claim 8. Claim 8 teaches that a headset or handset lifter has an electronic identifier stored therein, with the electronic identifier mappable to a network address, whereas in Alexander, one of ordinary skill in the art will recognize that it is personal computer 24 coupled to LAN 20a which includes an electronic identifier stored therein, with the electronic identifier mappable to a network address. In Alexander, personal computer 24 is referred to by itself as an IP telephony device together with IP telephony devices 22-23. See Alexander at Column 3, lines 66 to Column 4, line 1. Alexander makes no mention that the *headset* (coupled to personal computer 24) has an electronic identifier stored therein, with the electronic identifier mappable to a network address.

During a telephone call with Examiner on December 27, 2007, Examiner indicated that the claim term “headset” could possibly be interpreted broadly. However, Applicant respectfully submits that one of ordinary skill in the art would not define the term “headset” to encompass both a headset *and* a personal computer to which the headset is connected. Only under such an interpretation would Alexander anticipate claim 8, and Applicant respectfully submits that such an interpretation is unreasonable in view of the ordinary usage and meaning of the different terms “headset” and “personal computer”.

Thus, at least for the foregoing reasons, applicant respectfully submits that Alexander does not teach or suggest all the claimed elements of amended claim 8.

Claims 9-10

Claims 9-10 are dependent on claim 8. Therefore, it is respectfully submitted that claims 9-10 are patentable over Alexander at least for the reasons stated above with respect to the patentability of claim 8. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 9-10.

Claim 12

Claim 12 reads as follows:

12. A telephony asset assembly for being managed over a network by a remote system, the assembly comprising:
- an asset comprising a *headset or handset lifter*;
 - a proxy device operatively coupled to the asset, the proxy device having a network interface configured to *assign a network address for the asset and communicatively couple with the remote system over a network using the network address*; and
 - a management module, the *management module operatively coupled to the asset for performing a management task thereon*.

Claim 12 teaches a telephony asset assembly for being managed over a network by a remote system. The assembly includes an asset comprising a headset or handset lifter. The assembly also includes a proxy device operatively coupled to the headset or handset lifter, where the proxy device has a network interface configured to *assign a network address for the headset or handset lifter* and communicatively couple with the remote system over a network using the network address. The assembly further includes a management module, where the management module is operatively coupled to the asset for performing a management task thereon.

Alexander does not teach or suggest a telephony asset assembly including a proxy device operatively coupled to a headset or handset lifter, where the proxy device has a network interface configured to *assign a network address for the headset or handset lifter*.

Examiner cites Alexander at Col. 4, lines 12-14, where Alexander states that a headset is connected to a personal computer 24 to form an IP telephony device. However, by stating that a headset must be connected to a personal computer 24 to form the IP telephony device, Alexander *teaches away* from claim 12. Claim 12 teaches that a network address is assigned to the headset or handset lifter, whereas in Alexander, one of ordinary skill in the art will recognize that it is personal computer 24 coupled to LAN 20a for which a network address is assigned. In Alexander, personal computer 24 is referred to by itself as an IP telephony device together with IP telephony devices 22-23. See Alexander at Column 3, lines 66 to Column 4, line 1. Alexander makes no mention that the *headset* (coupled to personal computer 24) is assigned a network address.

During a telephone call with Examiner on December 27, 2007, Examiner indicated that the claim term “headset” could possibly be interpreted broadly. However, Applicant respectfully submits that one of ordinary skill in the art would not define the term “headset” to encompass both a headset *and* a personal computer to which the headset is connected. Only under such an interpretation would Alexander anticipate claim 12, and Applicant respectfully submits that such an interpretation is unreasonable in view of the ordinary usage and meaning of the different terms “headset” and “personal computer”.

Thus, at least for the foregoing reasons, applicant respectfully submits that Alexander does not teach or suggest all the claimed elements of amended claim 12.

Claims 14-18

Claims 14-18 are dependent on claim 12. Therefore, it is respectfully submitted that claims 14-18 are patentable over Alexander at least for the reasons stated above with respect to the patentability of claim 12. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 14-18.

Claim 19

Claim 19 reads as follows:

19. A call center comprising:
 - a plurality of call center assets, wherein each of the plurality of call center assets is a *headset or handset lifter*;
 - a plurality of network interfaces, each network interface associated with at least one asset and configured to communicate over a network for the asset;
 - a central management system configured to communicate with the network interfaces over the network *to perform at least one management task related to the assets*.

Claim 19 teaches a call center including a plurality of call center assets, where each of the plurality of call center assets is a headset or handset lifter. The call center includes a plurality of network interfaces, where each network interface is associated with at least one headset or handset lifter and configured to communicate over a network for the headset or handset lifter. The call center further includes a central management system configured to communicate with the network interfaces over the network to perform at least one management task related to the headsets or handset lifters.

Alexander does not teach or suggest a call center including a plurality of call center assets, where each of the plurality of call center assets is a headset or handset lifter. Alexander does not teach or suggest a central management system configured to communicate with the

network interfaces over the network to *perform at least one management task related to the headsets*.

Examiner cites Alexander at Col. 4, lines 12-14, where Alexander states that a headset is connected to a personal computer 24 to form an IP telephony device. However, by stating that a headset must be connected to a personal computer 24 to form the IP telephony device, Alexander *teaches away* from claim 19. Claim 19 teaches that a management task is performed related to the headsets, whereas in Alexander, one of ordinary skill in the art will recognize that it is personal computer 24 coupled to LAN 20a for which management tasks are performed. In Alexander, personal computer 24 is referred to by itself as an IP telephony device together with IP telephony devices 22-23. See Alexander at Column 3, lines 66 to Column 4, line 1. Alexander makes no mention that a management task is performed related to the *headset* (coupled to personal computer 24).

During a telephone call with Examiner on December 27, 2007, Examiner indicated that the claim term “headset” could possibly be interpreted broadly. However, Applicant respectfully submits that one of ordinary skill in the art would not define the term “headset” to encompass both a headset *and* a personal computer to which the headset is connected. Only under such an interpretation would Alexander anticipate claim 19, and Applicant respectfully submits that such an interpretation is unreasonable in view of the ordinary usage and meaning of the different terms “headset” and “personal computer”.

Thus, at least for the foregoing reasons, applicant respectfully submits that Alexander does not teach or suggest all the claimed elements of amended claim 19.

Claims 21-23

Claims 21-23 are dependent on claim 19. Therefore, it is respectfully submitted that claims 21-23 are patentable over Alexander at least for the reasons stated above with respect to the patentability of claim 19. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 21-23.

Claim 28

Claim 28 reads as follows:

28. A proxy device to facilitate the management of a call center or office telephony asset by a remote system, comprising:
- a network interface configured to communicatively couple to the remote system over a network, the network interface further configured to *assign an identifier to the asset, the identifier being mappable to a globally unique network address associated with the asset*; and
 - a management module communicatively coupled to the network interface, the management module configured to facilitate a management task for the asset in response to receiving a management instruction communication from the remote system that is associated with the asset's globally unique network address, wherein *the asset comprises a headset or handset lifter*.

Claim 28 teaches a proxy device to facilitate the management of a call center or office telephony asset by a remote system. The proxy device includes a network interface configured to communicatively couple to the remote system over a network, where the network interface is further configured to *assign an identifier to the headset or handset lifter, and the identifier is mappable to a globally unique network address associated with the headset or handset lifter*. The proxy device further includes a management module communicatively coupled to the network interface, where the management module is configured to facilitate a management task for the headset or handset lifter in response to receiving a management instruction

communication from the remote system that is associated with the headset's or handset's globally unique network address.

Alexander does not teach a proxy device including a network interface configured to communicatively couple to the remote system over a network, where the network interface is further configured to *assign an identifier to the headset or handset lifter, and the identifier is mappable to a globally unique network address associated with the headset or handset lifter*. Furthermore, Alexander does not teach a management module configured to facilitate a management task for the headset or handset lifter in response to receiving a management instruction communication from the remote system that is associated with the headset's or handset's globally unique network address.

Examiner cites Alexander at Col. 4, lines 12-14, where Alexander states that a headset is connected to a personal computer 24 to form an IP telephony device. However, by stating that a headset must be connected to a personal computer 24 to form the IP telephony device, Alexander *teaches away* from claim 28. Claim 28 teaches that an identifier is assigned to the headset, and the identifier is mappable to a globally unique network address associated with the headset or handset lifter, whereas in Alexander, one of ordinary skill in the art will recognize that it is personal computer 24 coupled to LAN 20a for which a network address is assigned. In Alexander, personal computer 24 is referred to by itself as an IP telephony device together with IP telephony devices 22-23. See Alexander at Column 3, lines 66 to Column 4, line 1. Alexander makes no mention that the *headset* (coupled to personal computer 24) is assigned an identifier that is mappable to a globally unique network address associated with the headset.

During a telephone call with Examiner on December 27, 2007, Examiner indicated that the claim term "headset" could possibly be interpreted broadly. However, Applicant respectfully

submits that one of ordinary skill in the art would not define the term “headset” to encompass both a headset *and* a personal computer to which the headset is connected. Only under such an interpretation would Alexander anticipate claim 28, and Applicant respectfully submits that such an interpretation is unreasonable in view of the ordinary usage and meaning of the different terms “headset” and “personal computer”.

Thus, at least for the foregoing reasons, applicant respectfully submits that Alexander does not teach or suggest all the claimed elements of amended claim 28.

Claims 29-30

Claims 29-30 are dependent on claim 28. Therefore, it is respectfully submitted that claims 29-30 are patentable over Alexander at least for the reasons stated above with respect to the patentability of claim 28. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 29-30.

Claims 24-27

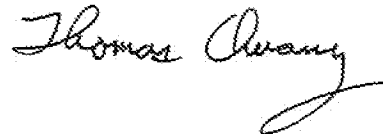
Claims 24-27 are rejected under 35 U.S.C. 103(a) as being unpatentable over Alexander in view of Weaver.

Claims 24-27 are dependent on claim 19. Therefore, it is respectfully submitted that claims 24-27 are patentable over Alexander in view of Weaver at least for the reasons stated above with respect to the patentability of claim 19. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 24-27.

CONCLUSION

In view of the above amendments and remarks, allowance of the pending claims is respectfully requested.

Respectfully submitted,



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